## REMARKS

Claims 2-16 are presented for reconsideration.

In the Office Action, claims 7-11 and 15 were withdrawn along with claim 3 as being directed to the non-elected species of Fig. 3; claims 1 and 4 were objected to, although it is noted that no statement of why claim 4 was objected to was presented; claim 4 was rejected under 35 USC 112, second paragraph; claims 1, 2, 4 and 13-14 were rejected under 35 USC 102(e) as being anticipated by Cohn et al (U.S. Patent No. 6,465,882); claim 5 was rejected under 35 USC 103 on Cohn et al in view of Haas (U.S. Patent No. 5,121,297); claims 6 and 12 were rejected under 35 USC 103 on Cohn et al in view of Marcovici et al (U.S. Patent No. 6,292,529). In addition, U.S. Patents to Hamzehdoost et al, Okumura et al and Von Der Haar were cited, but not applied.

By this amendment, an element number for the contacting link on page 6 has been corrected to be in agreement with the previous indications of the contacting link; claim 1 has been cancelled and represented as new claim 16 with amendments to overcome the rejections under 35 USC 112 and also to better highlight the features of the present invention over the prior art. In view of claim 1 being represented as claim 16, claims 2, 4, 5, 6, 12 and 13 have been amended to be dependent on claim 16 with amendments to claim 4 to overcome the rejection under 35 USC 112. In addition, withdrawn claim 15 has been amended to be dependent upon newly-presented claim 16.

With regard to the withdrawal of claims 3, 7-11 and 15, it is submitted that claim 16, on which all claims are directly or indirectly dependent, is allowable over the prior art for reasons being set forth hereinafter. It is respectfully submitted that the only difference between the species illustrated in Figs. 2 and 3 is that in Fig. 3, the opening being formed is in a step-like manner, so that the conductor tracks in more than one layer can be contacted. The limitation of claims 7, 11 and 15 for grounds of withdrawing claims 7-11 and 15 is not understood and is believed to be an incorrect interpretation and, thus, even if the Examiner holds that claim 16 is not allowable, it is submitted that claims 7-11 and 15 should be examined with the elected species.

It is respectfully submitted that the rejection of claims 1, 2, 4, 13 and 14 under 35 USC 102(e) as being anticipated by Cohn et al is in error and should be withdrawn for the following reasons. Cohn et al, contrary to the Examiner's position, does not teach or suggest a printed circuit board arrangement having at least a fixed portion and a movable, flexible layer arrangement. From the disclosure of Cohn et al, it is clear that the multi-layer substrate described therein may be produced by some layers which may be flexible as such; however, the layers are combined to form a rigid multi-layer substrate. There is no teaching in Cohn et al that the portion that the Examiner identified as 100 in the marked Figs. 5 and 6 attached to the Office Action is a flexible layer arrangement, while the portion the Examiner identified as 200 is the printed circuit board. It is submitted that the only suggestion of modifying this reference to provide those features is applicants' disclosure, which is not part of the prior art and, therefore, claim 16, which replaces independent claim 1, is clearly not anticipated by the reference and it is submitted that it would not be obvious since additional teachings, only provided by applicants' disclosure, are required. For these reasons, it is respectfully submitted that independent claim 16 and dependent claims 2, 4, 13 and 14 are clearly patentable over the teachings of Cohn et al and are allowable.

It is also submitted that while Haas may teach isolating layers of polyamide, and may teach flexible portions 12 connecting rigid portions 11, there is no teaching or suggestion of forming openings through the rigid circuit board portions to allow forming connections to the flexible portion, such as 12. Thus, it is submitted that claim 5 is clearly patentable over the combination of Cohn et al and Haas and is allowable.

With regard to claims 6 and 12, it is noted that while Marcovici et al may show x-ray detector systems comprising a detector array including a large number of photodiodes, it does not teach the deficiencies in Cohn et al. Therefore, claims 6 and 12 are also patentably distinct and allowable.

With regard to the withdrawn claims 3, 7-11 and 15, it is submitted that since these are dependent upon allowable independent claim 16 or a dependent claim which, in turn, is dependent upon allowable independent claim 16, these claims are allowable for the reasons that the base claim 16 is allowable. Therefore, it is submitted that the application should now be allowed with claims 2-16.

In view of the amendments and explanations contained hereinabove, it is respectfully submitted that this application is now in condition for immediate formal allowance and further reconsideration to that end is earnestly solicited.

Respectfully submitted,

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## **CERTIFICATE OF MAILING**

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to the Commissioner for Patents, PO Box 1450, Alexandria, Virginia 22313-1450 on May 28, 2004.

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May 28, 2004

Date